

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA  
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs,

- against -

MUFG UNION BANK, N.A. and GLAS AMERICAS  
LLC,

Defendants.

Case No: 19-cv-10023-KPF

**REPLY DECLARATION OF JAMES R. BLISS IN SUPPORT  
OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, JAMES R. BLISS, hereby declare pursuant to 28 U.S.C. § 1746 and Local Rule 7.1 as follows:

1. I am a partner at Paul Hastings LLP, attorneys for plaintiffs and counterclaim defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo.
2. Capitalized terms used herein have the same meanings as in Plaintiffs' memorandum of law in support of Plaintiffs' motion for summary judgment.
3. Attached to this declaration as Exhibit 1 is a true and correct copy of State Dep't, *Seating of the Venezuelan National Assembly* (Jan. 5, 2016).
4. Attached to this declaration as Exhibit 2 is a true and correct copy of State Dep't, *Venezuela: Inclusion of All Parties a Key to Solving Challenges* (Feb. 17, 2016).
5. Attached to this declaration as Exhibit 3 is a true and correct copy of State Dep't, *Remarks at the Special Meeting of the OAS Permanent Council on Venezuela*, Statements of Michael J. Fitzpatrick (June 21, 2016).

6. Attached to this declaration as Exhibit 4 is a true and correct copy of State Dep't,

*Remarks at the Organization of American States*, Statement of Secretary of State Michael R. Pompeo (Jan. 24, 2019)

7. Attached to this declaration as Exhibit 5 is a true and correct copy of *Deutsche Bank AG London Branch v. Receivers Appointed by the Court* [2020] EWHC 1721 (Comm).

8. Attached to this declaration as Exhibit 6 is a true and correct copy of Order, *Impact Fluid Solutions et al v. Bariven S.A. et al*, Civ No. 4:19-cv-00652, Dkt. No. 55, (S.D. Tex. May 20, 2020).

9. Attached to this declaration as Exhibit 7 is a true and correct copy of the Brief for the United States of America as Amicus Curiae in Support of the Republic of Argentina's Petition for Panel Rehearing and Rehearing En Banc, *NML Capital, LTD., et al., v. The Republic of Argentina*, No. 12-105-cv(L), Dkt. No. 653 (2d Cir. Dec. 28, 2012).

10. Attached to this declaration as Exhibit 8 is a true and correct copy of Juan Cristóbal Carmona Borjas, *2 Activity and Public Finance in Venezuela* (2016) (translated).

11. Attached to this declaration as Exhibit 9 is a true and correct copy of Duque Corredor, *Opinion on the Unconstitutionality of the 2020 PDVSA Notes* (2020) (translated).

12. Attached to this declaration as Exhibit 10 is a true and correct copy of Eyanir Chinea, *Venezuela court annuls Congress probe of \$11 billion missing at PDVSA*, REUTERS (Oct. 27, 2016).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 15<sup>th</sup> day of July, 2020

/s/ James R. Bliss